

May 3, 2002

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: CC Docket No. 02-33  
Notice of Proposed Rulemaking (FCC 02-42)

Dear Ms. Dortch:

On behalf of Irish & Reynolds, Inc., I am writing to express my support for the comments filed on the above-referenced proceeding by The Wireless Communications Association International, Inc. ("WCA"), and to urge the Commission not to impose Universal Service Fund obligations on smaller license-exempt providers of wireless broadband services.

We are a small local business with a staff of 2. Since January, 2002, we have been using the 2.4 GHz license-exempt bands to provide high-speed Internet access to our rural local community of Nederland, CO, where there is no cable modem or DSL service. Other than satellite services, we are the only competitive alternative. Our funding has been completely a personal investment and we have been able to provide our customers with the type of broadband service usually available only in larger cities for a **very** affordable price. The community response is very enthusiastic since there are no other sources of broadband service!

Like any other small business, we face many daunting economic challenges, but have only limited resources available to us. We therefore are extremely concerned about the possibility that the Commission will subject us to USF reporting and contribution obligations. We estimate that our annual cost of complying with USF reporting obligations would be as much as \$1000, not including the additional costs associated with explaining USF charges to subscribers and dealing with any subsequent subscriber complaints.

While we generally support the broad objectives of universal service, we do not believe it is equitable to sacrifice the future of wireless broadband (which operates **without any** subsidy) to support "copper wire" services that wireless is better equipped to provide in rural areas! Also, we are not an ILEC or a cable MSO, and we simply cannot afford the personnel or administrative resources necessary for USF compliance! Any diversion of what little staff (2!) we have will have a direct and immediate adverse effect on our ability to serve our customers. Our business, in other words, would be put at unnecessary risk, and our customers ultimately would pay the price.

We therefore urge the Commission to take these considerations into account and, at a minimum, not impose USF reporting and contribution obligations on smaller license-exempt providers of broadband service.

Thank you for your consideration.

Sincerely,

Matt Reynolds  
CTO  
Irish & Reynolds, Inc.  
DBA: Nednet  
PO box 115  
Nederland, CO 80466